

Exhibit C

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

No. 20-cv-10832 (AT)

RIPPLE LABS, INC., BRADLEY GARLINGHOUSE, and
CHRISTIAN A. LARSEN,

Defendants.

**DEFENDANTS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO
PLAINTIFF SECURITIES AND EXCHANGE COMMISSION**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the “Local Rules”), Ripple Labs, Inc. (“Ripple”), Bradley Garlinghouse, and Christian A. Larsen (collectively, “Defendants”) submit the following requests for the production of documents (“Requests for Production”) to Plaintiff Securities and Exchange Commission (the “SEC” or “Plaintiff”). Subject to any scheduling order of the Court, Plaintiff shall make such production by **March 15, 2021**, pursuant to the Definitions and Instructions set forth below, to the offices of Defendants’ under-signed counsel, or by such other means as the parties may agree.

DEFINITIONS AND INSTRUCTIONS

The Definitions and Instructions set forth in Defendants’ First Request for Production of Documents, as well as the additional definitions set forth below, shall apply to the requests that follow:

- A. “On-Demand Liquidity” has the same meaning as it does in Paragraph 123 of the Complaint.
- B. “XRP Escrow” has the same meaning as it does in Paragraph 198 of the Complaint.

C. “XRP Ledger” has the same meaning as it does in Paragraph 38 of the Complaint.

SECOND REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 26:

All SEC policies governing SEC employees’ trading in, or purchase or sale of, Digital Assets and/or Virtual Currencies, including all changes and updates to those policies.

REQUEST FOR PRODUCTION NO. 27:

All Documents or Communications Concerning any policy, guidance, clearance or other permission or restriction given to current or former SEC Commissioner, staff member, officer or employee Concerning ownership or trading in XRP by such Person or their family members, including, but not limited to general SEC policies and individualized Communications with individuals.

REQUEST FOR PRODUCTION NO. 28:

All Documents or Communications Concerning any ownership or trading in XRP by You or any current or former SEC Commissioner, staff member, officer or employee, including (1) Documents sufficient to identify all digital asset wallet addresses over which You or such Person exercises or has exercised control, or maintains or has maintained the private keys, and (2) any wallet address used to distribute XRP, and any wallet address maintained on you or such Person’s behalf by any third party, digital asset trading platform or exchange.

REQUEST FOR PRODUCTION NO. 29:

All Documents Concerning analyses (including, but not limited to, any regression and correlation, or event study analysis) whether done by you or on your behalf relating to:

- a. Ripple and/or XRP;
- b. The XRP Ledger;
- c. On-Demand Liquidity;
- d. Correlations between the market performance of XRP and other Digital Assets and/or Virtual Currencies;
- e. Correlations between the market performance of XRP and public statements by Ripple, including, but not limited to, with respect to the XRP Escrow (as described in paragraph 198 of the Complaint) and On-Demand Liquidity; and
- f. The size and value of XRP sales over time, including, but not limited to, sales by Defendants.

REQUEST FOR PRODUCTION NO. 46:

All Documents and Communications Concerning the civil action *Tetragon Financial Group Ltd. v. Ripple Labs, Inc.*, C.A. No. 2021-0007-MTZ.

REQUEST FOR PRODUCTION NO. 47:

All Documents and Communications Concerning the following civil actions:

- *In re Ripple Labs Inc. Securities Litigation*, Case No. 18-06753, which consolidated several putative class actions brought in other courts. Those actions are:
 - *Zakinov, et al. v. Ripple Labs, Inc., et al.*, Case No. 18CIV02845;
 - *Oconer v. Ripple Labs, Inc., et al.*, Case No. 18CIV03332;
 - *Greenwald v. Ripple Labs, Inc., et al.*, Case No. 18CIV03461;
 - *Simmons v. Ripple Labs, Inc., et al.*, Case No. 20-02236; and
 - *Bitcoin Manipulation Abatement v. Ripple Labs, Inc., et al.*, Case No. 20-cv-03022.
- *Toomey v. Ripple Labs, Inc., et al.*, Case No. 21-00093.
- *Coffey v. Ripple Labs, Inc., et al.*, Case No. 18-3286.
- *Stelmaszyk v. Ripple Labs, Inc., et al.*, Case No. 20-584488.

REQUEST FOR PRODUCTION NO. 48:

All Documents and Communications Concerning the application of *Morrison v. Nat'l Austl. Bank Ltd.*, 561 U.S. 247 (2010), to Regulation S, including but not limited to, potential revisions to Regulation S.

Dated: New York, New York
February 12, 2021

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